REMARKS

Applicants and Applicants' attorney express appreciation to the Examiner for the courtesies extended during the recent Interview conducted on March 15, 2005. The amendments presented in this paper are consistent with the proposed amendments and arguments discussed during the Interview.

Claims 1-88 are pending, of which independent claim 1 is directed to a computer readable media storing a data structure, independent claims 67 and 78 are directed to methods for generating a data structure, and independent claims 72 and 83 are directed to computer program products generally corresponding to independent method claims 67 and 78, respectively. As indicated above, claims 1, 3, 13, 37, 38, 67, 68, 72, 73, 78, 79, 83, and 84 have been amended by this paper.[1]

The Office Action rejected claims 13-20 and 67-88 under 35 U.S.C. § 112, second paragraph, as being indefinite for failing to particularly point out and distinctly claim the subject matter which Applicants regard as the invention because claims 13, 67-68, 72-73, 78-79, and 83-84 each recite the word "may" as part of a claim limitation. Applicants disagree with the Office Actions' assertion but nevertheless have replaced the phrase "may be identified using" with "is identifiable from" in order to advance prosecution. Applicants note for the record that in the context of these claims, "is identifiable from" has the same meaning as "may be identified using" in that the term "may" intended to convey that the identification of an identity, the identification of a data type schema, and, when present, the identification of an instance "allows" or "is sufficient" for identifying a particular data object, as opposed to conveying that it "may" or "may not" be possible to identify the particular data object using these criteria, as asserted in the Office Action.

The Office Action rejected each of the pending independent claims (1, 67, 72, 78, and 83) under 35 U.S.C. § 103(a) as being unpatentable over U.S. Patent No. 6,553,427 to Chang et al. ("*Chang*").[2]

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[1]Support for the amendments can be found throughout the Specification, and particularly within paragraphs [0009]-[0012], [0025], [0032], [0037], and [0044], and within Figures 3 and 5.

[2]Although the prior art status of the cited art is not being challenged at this time, Applicants reserve the right to do so in the future. Accordingly, any arguments and amendments made herein should not be construed as acquiescing to any prior art status or asserted teachings of the cited art.

Applicants' invention, as claimed for example in independent claim 1, relates to a computer-readable medium storing or carrying thereon a data structure that represents a request to perform an operation on a data object associated with an identity. The data structure includes: one or more data fields that identify one of a plurality of identities who owns a data object to be accessed by one of a plurality of mobile applications in accordance with an identity-centric, as opposed to an application-centric, data access model; one or more data fields that identify one or more services that manage a plurality of data objects for the plurality of identities including the identity who owns the data object to be accessed, at least some of the data objects being organized in accordance with a data type schema; one or more data fields that identify one of a plurality of data type schemas corresponding to one of the plurality of mobile applications that access the plurality of data objects managed by the one or more services, wherein a particular data object to be accessed is identifiable from at least the identification of the identity who owns the data object to be accessed and the identification of the data type schema; and one or more data fields that identify an operation to be performed on the particular data object.

Applicants' invention, as claimed for example in independent method claim 67, relates to generating a data structure that represents a request to perform an operation on a data object associated with an identity. The method includes: generating and inserting a first set of one or more data fields into the data structure in accordance with the message schema, the first set of one or more data fields identifying one of a plurality of identities who owns a data object to be accessed by one of a plurality of mobile applications in accordance with an identity-centric, as opposed to an application-centric, data access model; generating and inserting a second set of one or more data fields into the data structure in accordance with the message schema, the second set of one or more data fields identifying one or more services that manage a plurality of data objects for the plurality of identities including the identity who owns the data object to be accessed, at least some of the data objects being organized in accordance with a data type schema; generating and inserting a third set of one or more data fields into the data structure in accordance with the message schema, the third set of one or more data fields identifying one of a plurality of data type schemas corresponding to one of the plurality of mobile applications that access the plurality of data objects managed by the one or more services, wherein a particular data object to be accessed is identifiable from at least the identification of the identity who owns the data object to be accessed and the identification of the data type schema; generating and

inserting a fourth set of one or more data fields into the data structure in accordance with the message schema, the fourth set of one or more data fields identifying correlation information for use in correlating the request with a response to the request; and generating and inserting a fifth set of one or more data fields into the data structure in accordance with the message schema, the fifth set of one or more data fields identifying an operation to be performed on the particular data object. Independent claim 72 recites similar limitations from the perspective of a computer program product.

Applicants' invention, as claimed for example in independent method claim 78, relates to interpreting a data structure that represents a request to perform an operation on a data object associated with an identity. The method includes: extracting and interpreting a first set of one or more data fields from the data structure in accordance with the message schema, the first set of one or more data fields identifying one of a plurality of identities who owns a data object to be accessed by one of a plurality of mobile applications in accordance with an identity-centric, as opposed to an application-centric, data access model; extracting and interpreting a second set of one or more data fields from the data structure in accordance with the message schema, the second set of one or more data fields identifying one or more services that manage a plurality of data objects for the plurality of identities including the identity who owns the data object to be accessed, at least some of the data objects being organized in accordance with a data type schema; extracting and interpreting a third set of one or more data fields from the data structure in accordance with the message schema, the third set of one or more data fields identifying one of a plurality of data type schemas corresponding to one of the plurality of mobile applications that access the plurality of data objects managed by the one or more services; identifying a particular data object to be accessed based at least on the identification of the identity who owns the data object to be accessed and the identification of the data type schema; extracting and interpreting a fourth set of one or more data fields from the data structure in accordance with the message schema, the fourth set of one or more data fields identifying correlation information for use in correlating the request with a response to the request; extracting and interpreting a fifth set of one or more data fields from the data structure in accordance with the message schema, the fifth set of one or more data fields identifying an operation to be performed on the particular data object; performing the operation on the particular data object; and returning a response to the

request, the response including at least some of the correlation information. Independent claim 83 recites similar limitations from the perspective of a computer program product.

In order to establish a *prima facie* case of obviousness, "the prior art reference (or references when combined) must teach or suggest all the claim limitations." MPEP § 2143 (emphasis added). During examination, the pending claims are given their broadest reasonable interpretation, i.e., they are interpreted as broadly as their terms reasonably allow, consistent with the specification. MPEP §§ 2111 & 2111.01.

Chang discloses an abstract, object-oriented encapsulation of a communications interface between intermediary, lower-level protocol handlers, and higher-level telecommunications service providers. Col. 2, ll. 42-48. The interface simplifies the development and maintenance of service application programs in that specialized communications handlers that were formerly developed for each different service application program can now be replaced by including in each service application program the library routines of the abstract, object-oriented communications interface. Col. 2, l. 66 – col. 3, l. 6.

Among other things, however, in connection with the other recited limitations, *Chang* fails to teach or suggest one or more data fields that identify one of a plurality of identities who owns a data object to be accessed by one of a plurality of mobile applications in accordance with an identity-centric, as opposed to an application-centric, data access model, as recited for example in each of the independent claims.

During the Interview, the Examiner seemed to concur with this analysis and indicated that the proposed amended claims appear to overcome the art rejection.

Based on at least the foregoing reasons, therefore, Applicants respectfully submit that the cited art fails to anticipate or make obvious Applicants' invention, as claimed, for example, in independent claims 1, 67, 72, 78, and 83. Applicants note for the record that the other rejections and assertions of record with respect to the independent and dependent claims are now moot, and therefore need not be addressed individually. Accordingly, Applicants do not acquiesce to any assertions in the Office Action that are not specifically addressed above, and hereby reserve the right to challenge those assertions in the future, including any official notice taken by the Examiner, if necessary or desired.

In the event that the Examiner finds remaining impediment to a prompt allowance of this application that may be clarified through a telephone interview, the Examiner is requested to contact the undersigned attorney.

Dated this 18th day of March 2005.

Respectfully submitted,

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